

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

L. Lin Wood, Jr.,

Plaintiff,

v.

Brad Raffensperger, in his official capacity  
as Secretary of the State of Georgia, et al.,

Defendants.

CIVIL ACTION FILE NO.  
20-cv-04651-SDG

**DECLARATION (AND AFFIDAVIT) OF RUSSELL CASON**

Personally appeared before me, the undersigned subscribing officer, duly authorized to administer oaths, RUSSELL CASON, who being duly sworn, deposed and stated as follows:

1. My name is RUSSELL CASON. I am over 18 years of age, a citizen of the State of Georgia, suffer from no legal disabilities, and am otherwise competent to testify to the matters contained herein. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.

2. I am a resident of Fulton County and registered elector in Fulton County, Georgia.

3. On November 15, 2020, I was present as an observer credentialed by the Democratic Party of Georgia to observe the statewide hand recount of ballots cast in the 2020 Presidential Election in Fulton County, Georgia (the “Recount”).

4. I arrived at the Georgia World Congress Center, where the Recount was held, at approximately 8:00 a.m.

5. On arrival, there was no exterior signage to indicate the entrance and a group of 15 to 20 people near me were milling around trying to figure out how to access the facility. Ultimately, we gained access to the building, though the absence of signage required some exploration before we found the table where we could sign in and then be sworn in between 8:30 am and 9:00 am.

6. As a Democratic representative, during our virtual training session, it was suggested that we wear blue clothing and judging from the numbers of observers dressed in red, it is likely someone told the Republicans representatives to wear that color. As was the case on the exterior of the building, inside there was no indication where Democrats or Republicans could or should congregate. As we entered the large room where the recount was being conducted, several tables were set up and individuals were checking people in. On the sign-up sheet, we were instructed to write our names and the political party we were representing. Immediately before my name on the sign-up sheet were at least five people with

GOP written beside their names. After being sworn in, at one point a woman approached me and asked where the Republican table was located. I was not able to help her, but a short while later I saw the woman gathered with a group of 20-25, so I took them to be Republican observers. Eventually, I was able to locate the table where the Democratic observers were gathered and checked in there as well.

7. At this juncture, announcements were being broadcast over the public address system. Due to an echo caused by the size of the room, I had difficulty making much sense of what was being said. The Democratic table was adjacent to the news media bullpen in the back of the room. We were told to “hang tight.”

8. At approximately 10 am, the election officials declared they had too many people on the floor and that they wanted each party to thin its ranks of observers to 17 people each. This was accomplished, and I held my station for the moment at the Democratic table.

9. At approximately 10:15 am, a cheer rang through the hall as it was announced that the inventory of ballots was complete. The election officials now instructed that the number of observers be reduced to 5 observers for each political party. Anyone who wanted to go was released.

10. In the absence of any further need for my services, I was happy to depart, which I did.

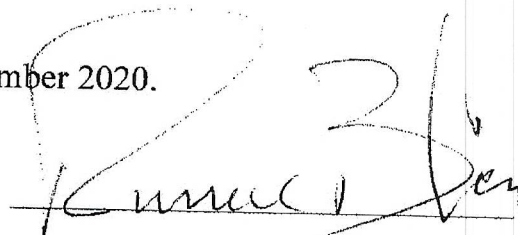
11. In conclusion, while appearing for service, I didn't ever get assigned to monitor the space where the counting of paper ballots was on-going. My experience was shared by many people of both political parties in my vicinity who appeared that day. I, like they, observed no inaccuracies, improprieties, inconsistencies, or other problems during my limited exposure to the Recount.

12. At no time did I see or hear of a credentialed observer being denied access to the Recount.

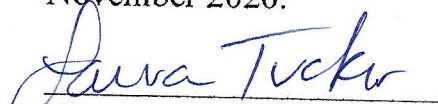
13. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

14. I declare under penalty of perjury that the foregoing is true and correct to the best of my ability.

Executed this 18<sup>th</sup> day of November 2020.

  
RUSSELL CASON (signed)

Sworn to and subscribed to  
before me this 18 day of  
November 2020.

  
Notary Public



My commission expires: March 28, 2023